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IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

REFLEX MEDIA, INC., a Nevada
 corporation,

Plaintiff,

v.

AARON WALLACE, an individual
 d/b/a www.PredatorsAlerts.com,
 www.PredatorAlerts.com;
 www.PredatorAlerts.co and
 PredatorsAlert.com; DOE NO. 4, an
 individual d/b/a
 www.PredatorExposed.com; ARMAN
 ALI, an individual d/b/a/ D4
 SOLUTIONS BD; MARCA
 GLOBAL, LLC, a Colorado limited
 liability company d/b/a
 www.InternetReputation.com; WEB
 PRESENCE, LLC, a Nevada limited
 liability company d/b/a
 www.EraseMugshots.com,
 www.NetReputation.com,
 www.GuaranteedRemoval.com, and
 www.ReputationLawyers.com; and
 DOES 5-15, inclusive,

Defendants.

Case No. 2:18-cv-02423-RFB-PAL

**SECOND AMENDED COMPLAINT FOR
 COMPUTER FRAUD AND ABUSE,
 UNAUTHORIZED ACCESS TO
 COMPUTERS, INTENTIONAL AND
 NEGLIGENT INTERFERENCE WITH
 PROSPECTIVE ECONOMIC
 ADVANTAGE, AND UNFAIR
 COMPETITION**

DEMAND FOR JURY TRIAL

Plaintiff Reflex Media, Inc., (“**Reflex Media**”) hereby brings this Second Amended
 Complaint (“**SAC**” or the “**Complaint**”) against Aaron Wallace¹ d/b/a
 www.PredatorsAlerts.com (“**PredatorsAlerts.com**”), www.PredatorAlerts.com
 (“**PredatorAlerts.com**”), www.PredatorAlerts.co (“**PredatorsAlerts.co**”), and

¹ Aaron Wallace has registered and done business through several companies in the past,
 although he has not (to the best of Reflex Media’s knowledge) used a registered corporation
 to conduct the business of PredatorsAlerts.com, PredatorAlerts.com, PredatorAlerts.co, or
 PredatorsAlert.com.

www.PredatorsAlert.com (“**PredatorsAlert.com**”); Doe No. 4 d/b/a www.PredatorExposed.com (“**PredatorExposed.com**,” and together with PredatorsAlerts.com, PredatorAlerts.com, PredatorAlerts.co and PredatorsAlert.com the “**Extortion Websites**”), Arman Ali d/b/a D4 Solutions BD and/or D-4 Solutions BD (“**D4 Solutions**”), Marca Global, LLC d/b/a www.InternetReputation.com (“**Marca Global**”), Web Presence LLC d/b/a www.EraseMugShots.com, www.NetReputation.com, www.GuaranteedRemoval.com, and www.ReputationLawyers.com² and RemoveMugshots.net (collectively, “**Web Presence**,” and together with “**Marca Global**,” the “**Removal Sites**”) and Does 5–15 (all defendants collectively, “**Defendants**”), and allege as follows:

INTRODUCTION

1. This case is about a country-wide extortion scheme being perpetrated by Defendants against Reflex Media and some of its customers.

2. Reflex Media operates several dating websites, including www.SeekingArrangement.com³ (“**SeekingArrangement.com**”).

3. Based on information and belief, Defendants’ scheme essentially works as follows:

a. Some Defendants join SeekingArrangement.com and pose as legitimate members for the purpose of gathering other members’ personal identifying information, including photos, email addresses, phone numbers, and locations. For example, a Defendant may join SeekingArrangement.com and pose as an attractive woman seeking to date successful men. Defendants then entice the male user to provide them with certain personal identifying information.

b. That personal identifying information is then posted to one, or more, of

² Although www.ReputationLawyers.com brands itself as a law firm, even saying they have “practice areas” in its terms of use, their website explains: “This term and service site do not provide legal services. We are not lawyers or a law firm and we do not provide legal advice.”

³ Reflex Media also owns and operates www.Seeking.com, which has assumed all internet traffic from SeekingArrangement.com. For the purposes of this complaint, Seeking.com and SeekingArrangement.com are one and the same.

1 the Extortion Websites where the SeeingArrangement.com members (the “SA
2 **Members**”) are victimized by Defendants’ extortion scam by being accused of
3 offering sex for money and associated with child predation.⁴

4 c. The targeted SA Members are then referred to the Removal Sites, where
5 they are told that the posting can be removed for a fee that generally ranges from
6 hundreds to even thousands of dollars.⁵

7 d. As explained below, the Extortion Websites, including those owned
8 and directed by Aaron Wallace, charge the Removal Sites a fee to process removals.
9 No questions are asked about the innocence of the victim posted to the Extortion
10 Websites, and the transaction is a simple exchange of money, often converted to
11 cryptocurrency (“**Bitcoin**”) by the Removal Sites for the Extortion Sites The
12 Removal Sites profit from the difference between the fee they charge the victims of
13 the extortion and the fixed fee they pay to the Extortion Website(s).

14 e. Many of the SA Members victimized by this scam also receive text
15 messages advising them that their information has been posted on the Extortion
16 Websites. In some cases, they also receive threats that the posting will be more
17 widely disseminated (*e.g.*, on mainstream social media) if they do not pay the
18 Removal Sites to remove the posting.

19 4. Defendants’ illegal operation has caused harm to Reflex Media through the
20 loss of SA Members and through damage to Reflex Media’s reputation and brand as a safe
21 and discreet place for people to find relationships on their terms. Accordingly, Reflex
22 Media has brought this action and respectfully requests that the Court bring an end to
23 Defendants’ illegal conduct.

24 5. The extortionists behind the scheme are sufficiently upset at this lawsuit that
25 they have threatened to make and have made false and derogatory statements about Reflex
26 Media’s counsel in this case on various Internet sites. Counsel received an email from a

27 ⁴ Each webpage on the Extortion Websites contains an embedded video depicting an adult
28 male preying on a female child.

⁵ The Removal Sites’ activities likely constitute money laundering in violation of 18 U.S.C.
§ 1956 and/or 18 U.S.C. § 1957.

purported “Ghost” threatening to spread such statements across the Internet. As the term “Ghosts” was used in the hearing before Judge Hamilton (before the case was transferred to this Court) that was attended only by parties’ counsel, it clearly appears the information was disseminated to the extortionists and that one of the Defendants, or someone associated with one of the Defendants, is determined to use the extortionary tactics described in this Second Amended Complaint as a weapon against Reflex Media’s counsel to retaliate and punish counsel for its representation in this matter and to deter vigorous future representation.

PARTIES

6. Plaintiff Reflex Media is a Nevada corporation, whose principal place of business is in Las Vegas, Nevada. As noted above, Reflex Media operates several dating websites, including SeekingArrangement.com.

7. Based on information and belief, Defendant Aaron Wallace is the owner/operator of the following websites: (1) PredatorsAlerts.com, a website that, while operational and used for the scheme complained of herein, was hosted in San Francisco, California, (2) PredatorAlerts.com, a website that, while operational and used for the scheme complained of herein, was hosted in Miami, Florida, (3) PredatorAlerts.co,⁶ a website that is currently operational and hosted in San Francisco, California, and (4) PredatorsAlert.com a website that, while operational and used for the scheme complained of herein, was hosted in Miami, Florida.

8. Defendant Doe No. 4 is the owner/operator of PredatorExposed.com. While operational and used for the scheme complained of herein, PredatorExposed.com was hosted in Manassas, Virginia.

9. Arman Ali is an individual residing in Rajshahi, Bangladesh, and upon information and belief, does business under the fictitious name “D4 Solutions BD” and/or “D-4 Solutions BD.” D4 Solutions claims to be an “IT firm engaged in the field of software product, web solutions, web training [] and consultancy . . .” However, based on

⁶ The owner/operators of the websites PredatorsAlerts.com, PredatorAlerts.com, and PredatorAlerts.co were named in prior complaints in this litigation as Doe Defendants 1-3.

1 information and belief, D4 Solutions, through Ali himself, or his employees and/or agents,
2 act as data miners (sometimes referred to as “**Data Miners**”) by creating fake profiles on
3 SeekingArrangement.com for the purpose of creating decoy accounts that he uses to collect
4 other users’ names, phone numbers, locations and photos and then uses or sells that
5 information to the Extortion Websites.

6 10. Defendant Marca Global, LLC, is a Colorado limited liability company with
7 its principal place of business in Greenwood Village, Colorado. Based on information and
8 belief, Marca Global, LLC, owns and operates InternetReputation.com, which offers paid
9 content removal services from the Extortion Websites and, based on information and belief,
10 like other Removal Sites identified by name on the Extortion Websites, agreed to have
11 InternetReputation.com advertised/marketed on at least some of the Extortion Websites as
12 a removal outlet and has processed removals for SA Members from at least some of the
13 Extortion Websites.

14 11. Defendant Web Presence LLC is a Nevada limited liability company whose
15 principal place of business is Sarasota, Florida. Based on information and belief, Web
16 Presence LLC owns and operates GuaranteedRemoval.com, NetReputation.com,
17 ReputationLawyers.com and RemoveMugshots.net, which offer paid content removal
18 services from the Extortion Websites. Web Presence, based on information and belief, like
19 other Removal Sites identified by name on the Extortion Websites, agreed to be advertised
20 and act as a removal outlet on at least some of the Extortion Websites and has processed
21 removals for SA Members from at least some of the Extortion Websites.

22 12. Defendants Does 5 through 15 are persons and entities whose true identities
23 are currently unknown but who participate in, and are in some manner responsible for, the
24 illegal extortion scheme described herein (the “**Extortion Scheme**”). Reflex Media
25 suspects that these persons and entities may include, but are not limited to:
26 RemoveSlander.com LLC, a Louisiana limited liability company that owns and operates
27 www.RemoveSlander.com; Maxxphire Branding Agency LLC, a Louisiana limited
28 liability company; Remove Reports LLC, a Delaware limited liability company; Pierre

1 Zarokian, a California resident who, based on information and belief, operates
2 www.ReputationStars.com and www.FixBadReputation.com; Profit Marking Inc., a
3 Canadian corporation that owns and operates www.123Remove.com,
4 www.GuaranteedRemovals.com, and www.TheReputationFirm.com; and Selfobsessed
5 Online Private Limited, an Indian corporation that owns and operates www.Defamed.com.
6 All of these suspected persons and/or entities offer paid removal services from at least some
7 of the Extortion Websites.

8 13. Reflex Media is informed and believes that at all times referenced herein, each
9 Defendant was or is the agent, employee, partner, co-venturer, joint venturer, successor-
10 in-interest, alter ego, and/or co-conspirator of each and all of the other Defendants and was
11 acting within the course and scope of said agency, employment, partnership, co-venture,
12 joint venture, relationship and/or conspiracy. Reflex Media is further informed and
13 believes, and on that basis alleges that each Defendant acted in concert with, and with the
14 consent of, each of the other Defendants, and that each Defendant ratified or agreed to
15 accept the benefits of the conduct of each of the other Defendants. Reflex Media is further
16 informed and believes, and on that basis alleges that each Defendant actively and
17 knowingly participated in the furtherance of the wrongful acts alleged herein, directed the
18 wrongful acts alleged herein, benefited from the wrongful acts alleged herein, and/or used
19 the entity-Defendants in a willful and intentional manner to carry out the wrongful acts
20 alleged herein.

21 **JURISDICTION AND VENUE**

22 14. This Court has jurisdiction over the subject matter of this action pursuant to
23 28 U.S.C. § 1331 because Reflex Media's claim against Defendants arises under the
24 Computer Fraud and Abuse Act, 18 USC § 1030 *et seq.* This Court has jurisdiction over
25 the state law claims pursuant to 28 U.S.C. § 1367, under the doctrine of supplemental
26 jurisdiction.

27 15. Personal jurisdiction exists over Aaron Wallace because, based on
28 information and belief, Wallace is the owner and operator of PredatorsAlerts.com,

PredatorAlerts.com, PredatorAlerts.co and PredatorsAlert.com. Some or all of these websites have posted and victimized California and Nevada residents, including residents of this district. In fact, based on information and belief, Wallace—acting in concert with one of the other Defendants—recently removed all profiles specifying “Nevada” that appeared on PredatorAlerts.co in an attempt to defeat this Court’s jurisdiction. However, Reflex Media knows that Nevada victims were posted to this website during relevant times referred to in this SAC (2016 to present) because Reflex Media took screenshots of 156 Nevada victim profiles that appeared on PredatorAlerts.co on November 7, 2018. Additionally, several SA Members located in Nevada filed complaints with Reflex Media because these members’ identities were posted on the various Extortion Websites and Reflex Media took individual captures of their profiles on PredatorAlerts.co, some with a posting date as far back as February 2017. Additionally, Nevada residents appear on captures of the Extortion Websites from the Internet Archive Wayback Machine, <http://web.archive.org/>, a website that has captures of over 349 billion webpages and describes itself as a “digital library of Internet sites.”

16. Based on information and belief, Aaron Wallace, and/or his agents (the Data Miners—including Arman Ali), at Aaron Wallace’s direction, purposely targeted Reflex Media, which is a Nevada company. They did so by creating fake profiles on SeekingArrangement.com and represented themselves to be California and Nevada residents (among other states) and targeted SA Members, SeekingArrangement.com, and by extension, Reflex Media. As such, this Court may exercise personal jurisdiction over Wallace and the Data Miners, including D4 Solutions, without offending traditional notions of fair play and substantial justice.

17. Personal jurisdiction exists over PredatorExposed.com because, based on information and belief, PredatorExposed.com has victimized California and Nevada residents, including residents of this judicial district. In addition, based on information and belief, PredatorExposed.com, and or its agents created fake profiles on SeekingArrangement.com—thereby targeting Reflex Media, a Nevada company—and

1 represented themselves to be California and Nevada residents, even representing
2 themselves to be residents of this judicial district. As such, this Court may exercise personal
3 jurisdiction over PredatorExposed.com without offending traditional notions of fair play
4 and substantial justice.

5 18. Personal jurisdiction exists over Defendant Marca Global because it
6 knowingly allowed its website, InternetReputation.com, to be advertised on the removal
7 policy webpages of at least some of the Extortion Websites, which websites (as per the
8 preceding paragraphs), were purposefully targeting California and Nevada residents, and
9 the Nevada company Reflex Media, and (on information and belief) directed or authorized
10 InternetReputation.com to process removals from those Extortion Websites. Marca Global
11 granted permission for InternetReputation.com to be used this way at the request of
12 Defendant Wallace. The websites on which InternetReputation.com advertised included
13 PredatorAlerts.com, PredatorsAlerts.com, and PredatorAlerts.co, and the advertising
14 period began no later than March 2017 and ended at (roughly) the end of 2018. Thus, Marca
15 Global's website, InternetReputation.com, acted as a "removal outlet" for at least some of
16 the Extortion Websites, thereby furthering the other Defendants' scheme, and targeting
17 those posted on (and blackmailed by) the Extortion Websites, including the SA Members
18 who were either California or Nevada residents. Marca Global could have stopped this;
19 indeed, during this litigation (between November 11 and December 31, 2018),
20 InternetReputation.com *was* removed from PredatorAlerts.co's removal policy webpage,
21 likely at the request of Marca Global. As the initial complaint in this lawsuit was filed on
22 August 16, 2018, and served on Defendant Marca Global on August 21, 2018, there was a
23 two and a half to four-month period after service in which InternetReputation.com (Marca
24 Global's website) was still advertised as a removal service on PredatorAlerts.co, and based
25 on their longstanding business model almost certainly was paying money to
26 PredatorAlerts.co for removals. Since this lawsuit was filed, Marca Global was certainly
27 aware that it was assisting a business that was targeting Reflex Media (a Nevada company)
28 and its customers in a country-wide extortion scheme, including customers located in

1 California and Nevada.

2 19. Additionally, from at least March 27, 2017, Marca Global was aware that text
3 messages were being sent on its behalf that instructed victims posted on at least one of the
4 Extortion Websites to use InternetReputation.com to pay for removal and on that same day
5 (March 27th), Marca Global requested that those text messages stop being sent on its
6 behalf. After March 27, 2017, Marca Global chose to continue to act as a removal outlet
7 on behalf of at least some of the Extortion Websites, including PredatorAlerts.com. In its
8 March 27, 2017, email to support@predatoralerts.com, Marca Global's Director of Finance
9 wrote: "[W]e [Marca Global] appreciate the relationship we have with your company [the
10 owner/operators of PredatorAlerts.com] that allows us to remove from your site" ... "We
11 are willing to assist clients in removing their information through our relationship [...]"
12 Indeed, as explained below, in January 2017 Aaron Wallace asked the owner of another
13 removal outlet service, Aaron Minc, an attorney and owner of Minc LLC, an Ohio limited
14 liability company that owns and operates www.DefamationRemovalLaw.com (collectively
15 "DRL") and who has acted as a removal outlet for PredatorsAlert.com,
16 PredatorAlerts.com, PredatorsAlerts.com, and PredatorsAlerts.co to refer removal requests
17 to Marca Global's website, InternetReputation.com. Further, Marca Global itself has said,
18 "Marca has never denied that it has assisted clients with getting their names removed from
19 online websites, including the websites identified by Reflex as [']Extortion Websites.[']"

20 20. Marca Global chose to act as a removal outlet and pay money (or equivalent
21 Bitcoin) to the Extortion Websites, thereby funding and fueling the continuation of a
22 nation-wide extortion scheme. Marca Global agreed to be posted as a removal outlet on
23 some or all of the Extortion Websites. Through this agreement, Marca Global took
24 calculated steps to target each and every victim posted to the Extortion Websites, including
25 Nevada and California residents and SeekingArrangement.com members, thereby
26 damaging both the business relationship between Reflex Media (a Nevada company) and
27 its customers, and Reflex Media's reputation in California, Nevada, and all other states and
28 countries targeted by the scheme. As such, this Court may exercise personal jurisdiction

1 over Marca Global without offending traditional notions of fair play and substantial justice.

2 21. Indeed, several Nevada SA Members complained that they were posted on at
3 least one of the Extortion Websites. As an example, on February 21, 2017, a Las Vegas,
4 Nevada, resident, who was an SA Member, complained to Reflex Media, in part:

5 <http://predatoralerts.com/removal-policy/>

6 The above referenced website stole me and my friends info from the site and
7 posted it along with our number. This is the only site that those pics are on so
8 I know for sure that it was stolen here [SeekingArrangement.com].

9 [...]

10 This is what it [a text message to the SA Member] said along with the website:
11 You and I were posted. [“]Your number and pics are on the site
12 predatoralerts.com for offering to pay for sex. I used internetreputation.com
13 to delete it quick.[”]

14 Your action on this matter will be really appreciated. They obviously want to
15 get paid to remove the pics and info.

16 The same SA Member who filed this complaint with SeekingArrangement.com appears on
17 the front page of PredatorAlerts.com on March 7, 2017 and was posted to that website on
18 February 19, 2017. In fact, a total of five Las Vegas, Nevada, residents appear on the
19 homepage of PredatorAlerts.com on March 7, 2017, with the following statement posted
20 next to each of their names and phone numbers: “Location: Las Vegas, Nevada Offered
21 Money for sex.” As mentioned, on March 27, 2017 Marca Global was undoubtedly aware
22 that it was being advertised as a removal outlet for PredatorAlerts.com; in another email
23 from that day, as an employee of Marca Global wrote: “They [PredatorAlerts.com] did a
24 text blast to everyone on their site to call us to remove their info.” Additionally, another
25 Nevada SA Member has stated that the Member had a big problem with
26 PredatorAlerts.com, did not feel safe, and would end his or her membership with
27 SeekingArrangement.com as a result.

28 22. Personal jurisdiction exists over Defendant Web Presence because it is a
registered Nevada limited liability company and, based on information and belief, it agreed
to be advertised as a removal outlet on some or all of Wallace’s Extortion Websites and

1 processed removals from the Extortion Websites. Through these agreements, Web
2 Presence targeted California and Nevada residents, including residents of this judicial
3 district. As such, this Court may exercise personal jurisdiction over Web Presence without
4 offending traditional notions of fair play and substantial justice.

5 23. In addition, personal jurisdiction is appropriate over those Defendants
6 engaged in the mining of personal information from SeekingArrangement.com, including
7 D4 Solutions, because, based on information and belief, they are directed by Defendant
8 Wallace to generate this content by mining the personal identifying information of
9 residents of this judicial district, and of California and Nevada more generally, thereby
10 expressly aiming or targeting their tortious conduct at California, Nevada, and this judicial
11 district. Similarly, the Removal Sites are—with the knowledge of the Defendants—posted
12 as removal outlets on the Extortion Websites and generate “clients” from the tortious acts
13 of Defendant Wallace. Further, based on information and belief, the Removal Sites must
14 obtain a so-called “arbitration license” to remove content from the Extortion Websites.
15 Based on information and belief, this “arbitration license” is actually a business
16 relationship with the Extortion Websites that allows the Removal Sites to remove content
17 from the Extortion Websites in exchange for payments to the Extortion Websites (these
18 payments being either a portion of the revenues generated by the Removal Sites from the
19 scheme’s victims or any amount above a flat fee paid to the Extortion Websites on a price
20 paid to and set by the Removal Sites). As such, this Court may exercise personal
21 jurisdiction over all Defendants without offending traditional notions of fair play and
22 substantial justice.

23 24. Venue is proper in this district under 28 U.S.C. § 1391(b)(2) and (3) because
24 a substantial part of the events and omissions giving rise to the claims asserted herein
25 occurred within this judicial district, substantial injury occurred in this district, and
26 Defendants are otherwise subject to the Court’s personal jurisdiction in this district.

27 **GENERAL ALLEGATIONS**

28 AARON WALLACE’S OWNERSHIP OF PREDATORSALERT.COM, PREDATORALERTS.COM,

PREDATORSALERTS.COM, AND PREDATORSALERTS.CO

25. Reflex Media has obtained documents showing that PredatorsAlert.com, PredatorAlerts.com, PredatorsAlerts.com and PredatorAlerts.co and ExposingJohns.com are, or previously were, owned, operated and/or controlled by Aaron Wallace during times relevant to the allegations to this case.

26. Emails obtained from DRL, who has acted as a removal outlet (in the same capacity as Defendants Marca Global and Web Presence) for PredatorsAlert.com, PredatorAlerts.com, PredatorsAlerts.com, and PredatorsAlerts.co, show an exchange of the equivalent of \$500 (or multiples of \$500) in Bitcoin for removal of a victim's (or multiple victims') information from one or more of Wallace's Extortion Websites. None of the emails discuss the innocence of the victim in relation to the post.

27. The removal process was usually simple. DRL or one of their employees would email an address associated with Wallace's Extortion Websites and ask if the Bitcoin payment address previously provided was still correct, the email address associated with Wallace's Extortion Websites would confirm the Bitcoin payment address (or provided an updated one) and then DRL, or one of his employees, would email back stating that they had sent the necessary Bitcoin and ask to remove webpages on one of the Extortion Websites by identifying the webpage's URL. Sometimes a victim was posted to one of the Extortion Websites again, and DRL, or one of their employees, would alert the Extortion Website of the prior payment so the posting could be re-removed.

28. On June 30, 2016, the user of the email address support@predatorsalert.com, (believed to be Defendant Wallace) reached out to Aaron Minc. Support@predatorsalert.com wrote, **"We are looking for more removal outlets that are willing to be placed on our site" ... "Let us know if youre (sic) interested."** (Emphasis added). On the same day, after Minc responded that he had operated in a removal capacity for many websites and asked how much PredatorsAlert.com charged for removal, support@predatorsalert.com responded: "Nice hearing from you. This is us from **exposingjohns**. We charge \$500." (Emphasis added).

1 29. On January 9, 2017, the email address support@predatoralerts.com replied
2 directly to an email exchange between Minc and support@predatorsalert.com. This reply
3 shows that support@predatoralerts.com and support@predatorsalert.com were controlled
4 by the same person or entity. In that January 29, 2017, email, support@predatoralerts.com
5 states: “From what I recall, you are not doing removals with us anymore. **If you receive**
6 **any inquiries, please direct them to internetreputation.com.**” (Emphasis added).

7 30. On April 12, 2017, support@predatorsalerts.com wrote an email to Minc that
8 states, in part: “We apologize for the delay but we had an issue with our network. We are
9 back up online now. Notice the change in our domain from predatoralerts to
10 http://predatorsalerts.com.”

11 31. On August 16, 2018, an email from predatoralerts@protonmail.com to Minc
12 states, in part: “If you haven’t been receiving our emails the new domain is now
13 predatoralerts.co[,] it is no longer predatorsalerts(.)com[.]” From that date, DRL, continued
14 to ask and pay for multiple removals from PredatorAlerts.co over several months through
15 predatoralerts@protonmail.com, sometimes with the email address
16 support@predatoralerts.co in the “cc” address line of the email.

17 32. Furthermore, documents received pursuant to a subpoena served in this case
18 on Cloudflare, Inc.—a website hosting service provider—confirms that
19 PredatorsAlerts.com and PredatorAlerts.co are owned by the same user account.

20 33. Based on information and belief, ExposingJohns.com is the website
21 referenced in the June 30, 2016, email exchange between Aaron Minc and
22 support@predatorsalert.com that is quoted in Paragraph 28 of this Complaint.
23 ExposingJohns.com was a website that employed a similar extortion scheme as
24 PredatorsAlert.com, PredatorAlerts.com, PredatorsAlerts.com and PredatorAlerts.co.
25 Furthermore, Reflex Media has investigated whether several other top-level domain names
26 have been registered concurrently with the second level domain name “exposingjohns”
27 including exposingjohns.net, exposingjohns.org, exposingjohns.info, exposingjohns.biz,
28 exposingjohns.us and others, and have not found the same.

1 34. In or around the years 2014 and 2015, Minc also acted as a removal outlet
2 from ExposingJohns.com. In fact, in a July 23, 2015, email exchange,
3 exposingjohnscom@gmail.com writes to Minc:

4 Hey Aaron,

5 Very sorry about the slow response, we had some issues with our email and
6 have to get it fixed. Got lucky and saw you emailed here, thanks for the
7 removals. Did you receive my last couple of emails from the
8 support@exposingjohns.com email? I never heard back so I don't think you
9 did?

10 Just got those removals taken care of, will make sure I check here more often
11 so I can remove them immediately after you email.

12 By the way for the future transfers could you please start doing wire transfers?
13 Bitcoin is a bit difficult for both of us I think and this might make it easier?

14 Account Number: [redacted]

15 Routing Number: [redacted]

16 Beneficiary:

17 Rep Ten, LLC

18 199 E Flagler, St

19 Miami, FL 33131

20 Thanks and have a great day!

21 35. Historical WhoIs records show that ExposingJohns.com was registered to Rep
22 Ten LLC at the physical address of 6815 Biscayne Blvd Ste 103 394, Miami, Florida,
23 33138.

24 36. Rep Ten LLC was a company incorporated in Florida and, for a period, listed
25 its location with the State of Florida as 6815 Biscayne Boulevard, Suite 103 #394, later
26 changing to 199 E Flagler St., 615 Miami, FL 33131. The President, CEO, and Manager
27 of Rep Ten LLC is listed as Aaron Wallace. Rep Ten LLC is the alter ego of Wallace.

28 37. Defendant Wallace was also listed as the registrant of another website
employing an extortion scheme similar to the scheme complained of herein, named
PotentialPredators.com.

38. Rep Ten LLC was also listed as the owner of a dating website with the URL

1 www.NSAMeet.net.

2 39. On February 1, 2019, Wallace had a phone call with the undersigned counsel
3 and admitted that he was the owner of ExposingJohns.com and PotentialPredators.com.

4 DEFENDANTS' UNAUTHORIZED ACCESS TO SEEKINGARRANGEMENT.COM

5 40. As mentioned above, at the direction of Aaron Wallace, at least some
6 Defendants referred to herein as Data Miners are creating fake profiles on
7 SeekingArrangement.com (the "**Decoy Profiles**") that they use to meet and communicate
8 with SA Members for the purpose of collecting their names, phone numbers, locations, and
9 photos so that they and/or other Defendants can post that information on the Extortion
10 Websites.

11 41. Specifically, the scheme involving Wallace's Extortion Websites includes the
12 following: In two videos posted to YouTube.com in 2017, Arman Ali, or someone acting
13 on behalf of D4 Solutions, gives detailed instructions in Bengali on how to use virtual
14 private network technology to appear as though the Data Miner is located in various cities
15 in the United States to sign up for a SeekingArrangement.com account, pose as an attractive
16 female, and collect data requested by his buyers from SeekingArrangement.com. Reflex
17 had these videos translated. Below are some excerpts from the videos⁷:

18 **Video 1:**

19 Today, we are introducing you to a site from where we'll be able to collect/get
20 the kind of traffic we want. Based on the requirements of our buyers of the
21 data-entry job, we can get some solutions from this site [...] First, we'll open
22 a Gmail from our Chrome Browser [...] You can use Gmail, Yahoo!, Hotmail,
23 Outlook. There are many email platforms that you can use to get your job
24 done [...] Right after that, here in my pc, on my desktop there is a VPN. We
25 will connect to the US VPN [...] Now we got the US [...] Anyway. Now, I
26 am going to go to the site that we wanted to go. I want to go to the site where
27 we are going to work from and where we will collect the data from, Seeking
28 Arrangement [...] I will show you today how to open the accounts, and how

⁷ The video and translation show SA Members who were victims of the extortion scheme. Because Reflex Media wishes to protect these Members' anonymity and confidentiality, Reflex Media will only provide excerpts and a description of the videos here, and will produce copies of the videos and the translation once a protective order is entered into between the parties.

1 these accounts work tomorrow. The approval process can take up to 24 hours.
2 Once the accounts are approved, we can collect huge amounts of data. And, if
3 it works, and if the accounts work properly, we should be able to collect data
4 from those for seven days. Our target is to collect everyday ten data from each
5 account. What do I mean here when I say "data?" By "data" I mean cell phone
6 number and photo. The requirement from the buyers is that we need to identify
7 a person who is from the United States and who is between 18 and 55 years
8 old, and then get his/her cell phone number and a photograph. So, we are
9 going to do that. We will collect the data from here. This is where we can get
10 it from. We can get the data from here - the data that is required by the buyers
11 [...] I will go in as a 'Sugar Baby' and as one who is interested in men [...]
[the video goes on to explain steps on how to sign up for a
SeekingArrangement.com account, including ensuring that the IP address that
the fake account is using matches the location of the Decoy Profile.]

11 Video 2:

12 Friends, yesterday we saw how to open an account on "Seeking Arrangement"
13 [...] After opening the account, it takes 24 hours for the account to be
14 approved. So, let us take a look if the account we opened yesterday has been
15 approved. And, if it is approved then we will see how to collect our data from
16 there. So, then, Friends, let us begin our work on Part 2 [...] First, let me clean
17 my pc from the C-Cleaner of my browser. We should remember to always
18 clean our pc, since we work with VPN (Virtual Private Network) so, we need
19 to keep our browser always clean. Otherwise, the VPN will not connect
20 correctly, and we will not be able to do our work. If there is data in our browser
21 from previous session then the account we registered Yesterday, that account
22 will get merged with a new account by the same IP and our account may get
23 blocked. For this reason, we will always clean our pc properly before using it.
24 We will definitely have to remember this. So, let us see the account that we
25 opened yesterday - the one we worked with together [...] Let's login today,
26 to check. Before we login, let us first see where the account actually was [...]
27 Now, let us connect with our IP, let us connect to our VPN [...] VPN has been
28 connected. Now we will open the browser, the Chrome browser. Let us press
the Control+Shift+Delete buttons to clean the browser. And, in the browser
we have the site Seeking Arrangement - we will login into that site. Let us
login [...] Yes, my friends, take a look! There are quite a few responses here.
There are 14 messages, interest, interest for me, my picture, the profile I
created – we have 67 interests in it. That means, 67 people are interested in
me, in talking to me, in meeting me. And they feel interested in giving me
their data. Then, we will collect data from these messages. Our work is to
collect this data [...] So let us go to the messages. Let us see who sent us

1 messages. Friends, please remember that our job is to collect the cell phone
2 number and the Picture [...]

3 [The video depicts text conversations with several SA Members where the
4 Data Miner asks for and collects phone numbers, names and locations of
5 several SA Members, he then explains how to upload pictures to imgur.com
6 and provide a link to that photo to their buyer who requested a picture link
7 rather than the photo itself] [...]

8 All of them will give me their numbers, if I invest half an hour to an hour of
9 my time here then I will probably get at least 30 - 40 numbers from here. So,
10 if I can do even ten accounts like this on a daily basis, in that case I will be
11 able to collect 300 numbers and 300 pictures very easily [...] And so I will
12 get at least 10 sets of data for my requirement. That is my job that I will have
13 to do. If I can collect 100 numbers daily then normally I will be able to earn
14 Tk. 200 from here. And, if I am interested in the work, if I can do more, I will
15 make more money [...] And the work we do for the day, we will need to send
16 before 8 pm of that day.

17 42. Reflex Media has linked an image from the YouTube videos described in the
18 preceding paragraph to one, or more of the Extortion Websites.

19 43. The Decoy Profiles have been shut down by Reflex Media as they have been
20 identified and the Data Miners have been permanently banned from using
21 SeekingArrangement.com for any purpose.

22 44. Wallace's scheme involved circumventing barriers to mining information.
23 Reflex sent emails to the Data Miners at various addresses that the Data Miners provided
24 to create their Decoy Profiles. The emails told the Data Miners that Reflex had permanently
25 banned the Data Miners from use of SeekingArrangement.com and all other Reflex owned
26 websites for any purpose. Furthermore, Reflex set up internet protocol address blocks
27 against several internet protocol addresses that it believes the Data Miners used to
28 effectuate their illegal scheme.

45. Nevertheless, the Data Miners continue to return to SeekingArrangement.com
and gain, or attempt to gain, unauthorized access to the website using fake email accounts
and virtual private network technology. This "whack-a-mole" pattern detracts valuable
resources from Reflex Media's regular operations to prevent their illegal actions.

46. Based on information and belief, Defendant D4 Solutions is a Data Miner that
was directed by Defendant Wallace to collect SA Member data from

SeekingArrangement.com and then sell this SA Member data to Defendant Wallace to be posted on his Extortion Websites.

47. In fact, according to D4 Solutions, for every 100 personal profiles mined from SeekingArrangement.com, his agents will be paid 200 Bangladeshi taka (approximately \$2.50 USD).

THE EXPOSURE AND EXTORTION

48. The SA Member information collected by the Data Miners is posted to one or more of the Extortion Websites. As explained above, much of SA Member information and other data used on one of the Extortion Websites has been used on the other Extortion Websites. In all (or nearly all) cases, the SA Member information, once posted to one (or a multiple of the Extortion Websites), is tied to a claim that the profiled victim “pays money for sex,” or some similar defamatory accusation.

49. In some cases, on PredatorExposed.com, the posting is accompanied by a countdown clock and demand that appears as follows:

| | | | |
|-------------|--------------|----------------|----------------|
| 10 | 08 | 21 | 30 |
| Days | Hours | Minutes | Seconds |

If no arbitration is taken before countdown expired, then this predator’s post will be posted on social media websites such as Google, Bing, Facebook and Twitter.

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50. Accompanying each SA Member's personal identifying information posted to the Extortion Websites is a hyperlink that appears as follows:

CLICK HERE
REMOVE
MY
NAME

51. On PredatorsAlerts.com, clicking on this link took the visitor to <http://predatorsalerts.com/removal-policy/>, where the following internet content removal service providers were listed: DefamationRemovalLaw.com, InternetReputation.com, RemoveSlander.com, RemoveReports.com, ReputationLawyers.com, ReputationStars.com, "Fix Bad Reputation," and "Defamed."

52. On PredatorAlerts.com, clicking on this link took the visitor to <http://predatoralerts.com/removal-policy/>, where the following internet content removal service providers were listed: ReputationLawyer.com, "Internet Reputation," "Remove Slander," "Guaranteed Removals," "Defamed," "Reputation Stars," and "Fix Bad Reputation."

53. On PredatorAlerts.co, clicking on this link takes the visitor to <http://predatoralerts.com/removal-policy/>, where the following internet content removal service providers were listed: DefamationRemovalLaw.com, Internetreputation.com, RemoveSlander.com, RemoveReports.com, ReputationLawyers.com, ReputationStars.com, "Fix Bad Reputation," and "Defamed."

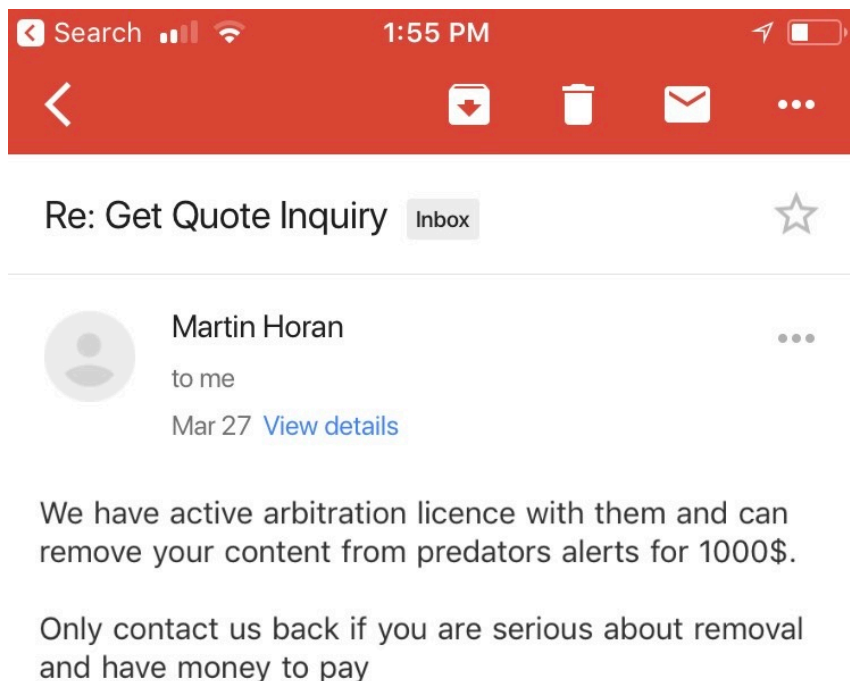
54. On PredatorExposed.com, clicking on this link took the visitor to <http://predatorexposed.com/removal-policy/>, where the following internet content removal service providers were listed: Minclaw.com, 123Remove.com,

RemoveOnlineInformation.com, Maxxphirepr.com, Removemugshots.net, GreatOnlineReputation.com, “Fix Bad Reputation,” and “Defamed.”

55. On PredatorExposed.com, the foregoing removal websites advertise that they can remove a person posted or “exposed” on one of the Extortion Websites in 24 hours to 30 days for a removal fee ranging from \$600 to \$2,400.

56. Based on these guarantees, quick turnaround times, and the facts below regarding the representations made by the various internet content removal service providers (including the Removal Sites) and the collection of email provided by the owner of a fellow removal provider, DRL, Plaintiff Reflex Media believes that the Extortion Websites and the Removal Sites have an agreement that allows the Removal Sites to remove content from the Extortion Websites in exchange for payment, with the understanding that the Extortion Websites will generate clients for the Removal Sites.

57. The President of Remove Reports LLC, Martin Horan, which owns and operates RemoveReports.com, has claimed (several times) that his company has an “arbitration license” with at least two of the Extortion Websites. One of those claims was made in an email to a SA Member, part of which appears below:



58. The Extortion Websites describe the internet content removal service providers listed on their websites, including the Removal Sites as “arbitration services.”

59. Indeed, the webpage <https://removereports.com/removal/predatorsalerts-com/> states, in part:

“[Y]ou need not worry when Remove Reports has your back. Our healthy relationship with Predators Alerts lets us do the task in few hours. They only require our verbal agreement to remove the complaints from their website. We have expertise in dealing with complaint sites and have grown our relationships with more than 135 websites from around the world. You would not be turned down with Remove Reports.”

See **Exhibit 1**.

60. Another internet content removal service, RemoveSlander.com, was named in a media report as having paid another extortion website, Florida.Arrests.org. In that case, individuals that were “exposed” on Florida.Arrests.org could—in exchange for \$9.95—receive automated removal of mugshots, for \$19.90 an expedited automated removal, and for \$399, Google de-indexing.

See **Exhibit 2**.

61. On ExposingJohns.com, Defendant Wallace’s previous website, a paid advertisement banner linking to InternetReputation.com was posted. Because InternetReputation.com is a website of Marca Global, Marca Global (on information and belief) paid for advertisements on Defendant Wallace’s previous website ExposingJohns.com. Additionally, InternetReputation.com had a webpage which advertised that it could remove information from ExposingJohns.com from at least July 13, 2014, until at least November 26, 2015. Accordingly, Reflex Media believes that Marca Global has acted as a removal outlet on the behalf of Defendant Wallace since at least July 2014 and also paid Wallace for removals from ExposingJohns.com.

62. Based on information and belief, the Extortion Websites, or their agents, send text messages to the SA Members posted on the Extortion Websites to alert them that their information has been “exposed” and to refer them to the Reputation Websites. The

1 following are several text messages that were sent/received⁸:

- 2 • “You and I were posted. Your number and pics are on the site
3 predatoralerts.com for offering to pay for sex. I used internetreputation.com
4 to delete it quickly.”
- 5 • “[Y]ou and I were posed on www.predatoralerts.com/[phone number of SA
6 Member] for offering money to girls online for sex I used netreputation.com
7 to get it deleted. They are good”
- 8 • “You and I were posted on predatoralerts.com/[phone number of SA Member]
9 for offering money to girls online for sex. I used netreputation.com to get it
10 deleted right away.”
- 11 • “You and I were posted on predatorsalerts.com/[phone number of SA
12 Member] for offering girls money online for sex. I used
13 guaranteedremoval.com 833-873-0360 to get it deleted[.]”

14 An iteration of each one of these texts were sent to multiple SA Members.

15 63. One SA Member reported that after receiving a text advertising Marca
16 Global’s InternetReputation.com (identical to the text message in the first bullet point
17 above), he was sent a text message stating “are u really paying girls for sex? why r u on
18 predatoralerts.com get it removed bc once people repost u on predatorswatch.com and
19 myex.com it will be harder.”

20 64. MyEx.com was a revenge porn and extortion site that was shut down by the
21 Federal Trade Commission and the State of Nevada in January 2018. Marca Global’s
22 InternetReputation.com is identified in the FTC/Nevada complaint as an arbitration service
23 “communicated to consumers through links or emails . . .” and “[t]hrough these services or
24 otherwise, Defendants demanded payments of \$499 up to \$2,800 from consumers for
25 removal of intimate images and personal information posted on the website.” See **Exhibit**
26 **3**.

27
28 ⁸ These text message advertisements were sent in violation of California’s anti-spam laws, the CAN-SPAM Act, and/or the Telephone Consumer Protection Act, depending on whether the sender used a phone or computer to transmit the text messages.

65. PredatorsWatch.com is also an extortion website, much like that of the Extortion Websites complained of herein that has been described by the San Diego Free Press as “a website infamous for labeling innocent people as pedophiles or child abusers.” Doug Porter, San Diego Free Press, *Internet ‘Predator’ Scam Targets Local Journalists* (April, 6, 2017) available at <https://sandiegofreepress.org/2017/04/internet-predator-scam-targets-local-journalists/>, a copy of this article as also attached as **Exhibit 4**. InternetReputation.com is listed as an “arbitration service” on the PredatorsWatch.com webpage <http://www.predatorswatch.com/removal/>. Two of the “arbitration services” are marked as having had their accounts suspended; InternetReputation.com is not suspended. See **Exhibit 5**.

66. The San Diego Free Press’ article singled out InternetReputation.com and, in response, a commenter using the name “InternetReputation.com” wrote, in part:

“PredatorsWatch.com has historically not been willing to deal directly with individuals, such as Barbara. We have no input or influence over their policies. We can however advocate on behalf of numerous individuals, simultaneously, to create enough volume and momentum to encourage the offending site to remove false information. This is the only way these websites have proven to be responsive. Our pricing is driven by the arbitrary amount quoted by the website. While this type of service is not our main service, we offer it because individuals deserve the right to defend and protect themselves online. We derive little economic benefit from providing this service. However, it is part of a complete solution for helping individuals defend themselves online.”

See **Exhibit 4**.

67. A YouTube video found at https://www.youtube.com/watch?v=gZet_E-ozA8 shows part two of an exposé about PredatorsWatch.com and InternetReputation.com and includes audio of a statement made by a representative of InternetReputation.com. In the video, the representative states, in part: “Once we get enough people to them [PredatorsWatch.com] and they start responding and they realize that there’s something there, then yes, they will tell us whatever it is and then we’ll come back and we’ll have that be the established price for it.”

1 68. Further, a purported former employee wrote (in part) on GlassDoor.com's
2 webpage for InternetReputation.com the following:

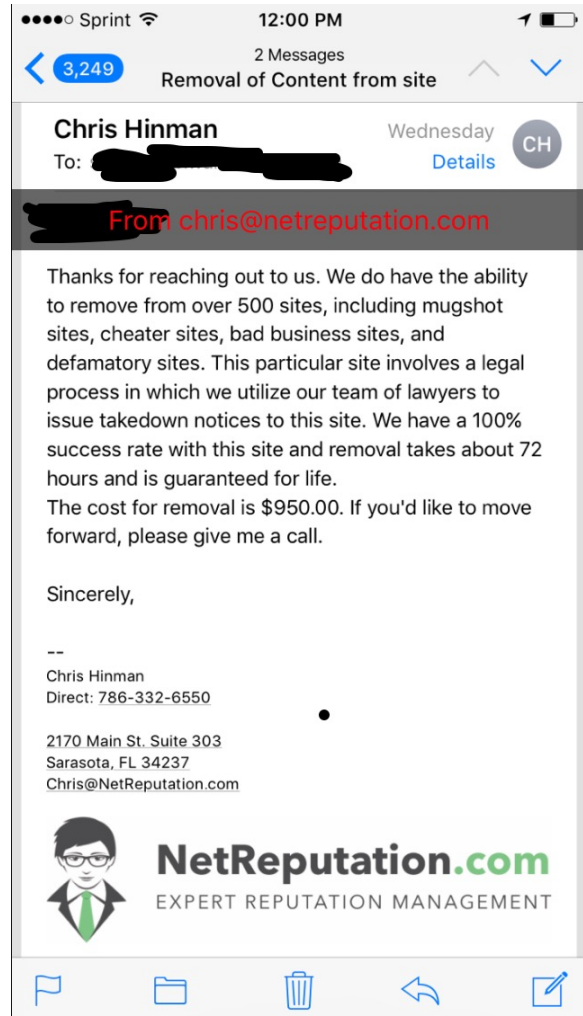
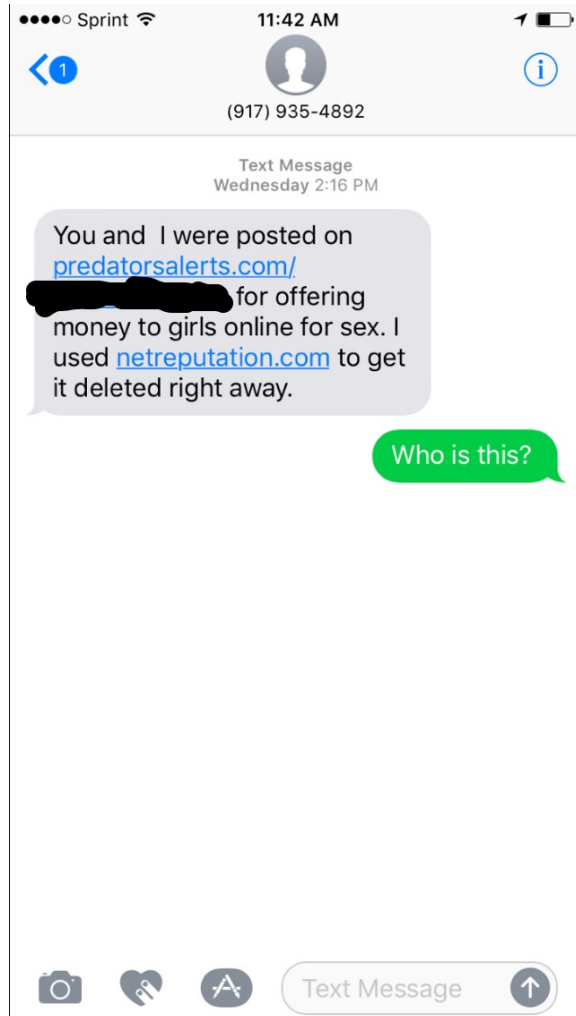
3
4 "This company is extremely unethical. They sell you on how they help people
5 and they sell customers on the same thing. In reality they're the ones that put
6 the mugshots or ripoff reports online in the first place, then extort people
hundreds of thousands to get things taken down"

7 See **Exhibit 6**.

8
9 69. One SA Member reported that they received a text message stating that he
10 was posted to PredatorsAlerts.com for "paying women for sex" and then, directly after,
11 received texts that stated "remove Arrest Records and Personal Information from the
12 internet i[n] 72 hours. EraseMugshots.com is a full-service Online Privacy firm. Call
13 866.601.6803" and "remove Personal Information and Personal Information from the
14 internet i[n] 72 hours. NetReputation.com is a full-service Online Privacy firm. Call
15 866.989.8163[.]"⁹

16 70. Another SA Member reported that they were sent a text message advertising
17 NetReputation.com and then contacted NetReputation.com in an email, to which the
18 NetReputation.com representative stated they could remove the content in 72 hours. That
19 text message and email were redacted by the SA Member and shared with Reflex Media;
20 both are shown below:

21
22
23
24
25
26
27
28 ⁹ EraseMugshots.com and NetReputation.com are owned and operated by Defendant Web Presence.



71. Another SA Member reported that his information was removed from PredatorsAlerts.com within twenty minutes of paying a \$699 removal fee to Web Presence through GuaranteedRemoval.com. The SA Member provided proof of payment to Web Presence, a redacted version appears below. This SA member does not appear on PredatorAlerts.co, the only known Extortion Website currently in operation.

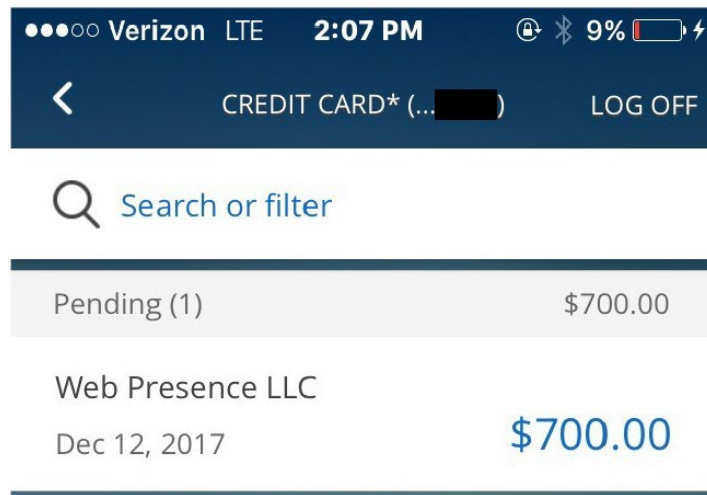
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72. Web Presence quotes prices to the victims of the Extortion Scheme described herein by looking at the position of the victim and charging a higher price if the victim is famous or more prominent.

73. Other text messages have included threats to make referrals to law enforcement and/or the SA Members' employers.

74. The Removal Sites knew or should have known that they are facilitating illegal payments to the Extortion Websites because the websites specialize in this field and even describe the type of content posted to the Extortion Websites as "illegal," "defamation," "blackmail," "slander," and "extortion." See **Exhibits 7, 8, 9, 10, 11, 12 and 13**. Also troubling is that the internet content removal service providers, including the Removal Sites, do not inquire whether the information posted about the victims is true or not. They just request payment.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

Computer Fraud and Abuse Act (18 U.S.C. § 1030) *Against All Defendants*

75. Reflex Media incorporates by reference each and every allegation contained in the preceding paragraphs of this complaint as if fully set forth herein.

76. Based on information and belief, certain Defendants named herein including D4 Solutions and/or their agents subscribed to SeekingArrangement.com for the purpose of creating Decoy Profiles that were used to surreptitiously gather or "mine" SA Members'

1 personal identifying information and photos.

2 77. Certain Defendants engaged in such data mining were caught, removed from
3 SeekingArrangement.com and prohibited from returning to SeekingArrangement.com.
4 Indeed, Reflex Media sent emails to the Data Miners telling them that they had been banned
5 from SeekingArrangement.com for any purpose.

6 78. Based on information and belief, thereafter Defendants personally, or through
7 their agents, returned to SeekingArrangement.com where they created new Decoy Profiles
8 and continued to mine SA Members' personal identifying information.

9 79. In other words, these Defendants accessed SeekingArrangement.com without
10 authorization and stole personal identifying information of the SA Members.

11 80. Reflex Media's computers, which host and operate
12 SeekingArrangement.com, constitute "protected computers" as that term is defined in 18
13 U.S.C. § 1030(e)(2).

14 81. As described above, Defendants conspired to commit and attempted to
15 commit violations of 18 U.S.C. § 1030(a)(2)(C), 18 U.S.C. § 1030(a)(4), 18 U.S.C. § 1030
16 (a)(7)(B) and 18 U.S.C. § 1030(a)(7)(C) in violation of 18 U.S.C. § 1030(b).

17 82. As described herein, the Removal Sites were aware that the Extortion
18 Websites planned to extort individuals on www.PredatorsAlerts.com,
19 www.PredatorAlerts.com, www.PredatorAlerts.co, and www.PredatorExposed.com to
20 obtain profits from the Removal Sites. Each Defendant intended for this extortion to be
21 committed and/or cooperated in the execution of this plan. The violations of 18 U.S.C. §
22 1030(a)(2)(C), 18 U.S.C. § 1030(a)(4), 18 U.S.C. § 1030(a)(7)(B) and 18 U.S.C. §
23 1030(a)(7)(C) in violation of 18 U.S.C. § 1030(b), by and through data miners, including
24 D4 Solutions, was a part of this plan. Therefore, each and every one of the Defendants is
25 involved in a civil conspiracy and liable for these acts.

26 83. Defendants' conduct has caused loss, as defined in 18 U.S.C. § 1030(e)(11)
27 of more than \$5,000 to Reflex Media during a one-year period.

28

SECOND CAUSE OF ACTION
Unauthorized Access to Computers (Cal. Penal Code § 502)
Against All Defendants

84. Reflex Media incorporates by reference each and every allegation contained in the preceding paragraphs of this complaint as if fully set forth herein.

85. SeekingArrangement.com is hosted and operated using a series of computers, computer networks and computer systems, as defined in Cal. Penal Code § 502.

86. As described above, certain of the Defendants named herein and/or their agents subscribed to SeekingArrangement.com for the purpose of creating Decoy Profiles that were used to surreptitiously gather or “mine” SA Members’ personal identifying information and photos, including information from California residents who used computers in California that connected to Reflex Media’s series of computers, computer networks and computer systems, as defined in Cal. Penal Code § 502.

87. Certain Defendants engaged in such data mining were caught, removed from SeekingArrangement.com and prohibited from returning to SeekingArrangement.com. Indeed, Reflex Media sent emails to the Data Miners telling them that they had been banned from SeekingArrangement.com for any purpose.

88. Based on information and belief, thereafter Defendants personally, or through their agents, returned to SeekingArrangement.com where they created new Decoy Profiles and continued to mine SA Members’ personal identifying information.

89. In other words, these Defendants accessed, and without permission, (i) used Reflex Media’s data in order to perpetrate a scheme to defraud SeekingArrangement.com’s customers; (ii) took and made use of data from Reflex Media’s computers, computer system and/or computer network, (iii) used Reflex Media’s computer services, and (iv) accessed Reflex Media’s computers, computer system and/or computer network in violation of Cal. Penal Code § 502(c)(1)–(3) and (6)–(7).

90. As described herein, the Removal Sites were aware that the Extortion Websites planned to extort individuals on www.PredatorsAlerts.com, www.PredatorAlerts.com, www.PredatorAlerts.co, and www.PredatorExposed.com to obtain profits from the Removal Sites. Each Defendant intended for this extortion to be

1 committed and/or cooperated in the execution of this plan. Unauthorized access to
2 computers, by and through data miners, including D4 Solutions, was a part of this plan.
3 Therefore, each and every one of the Defendants is involved in a civil conspiracy and is
4 liable for these acts.

5 91. Defendants' conduct has caused Reflex Media to suffer damages in an amount
6 to be proven at trial.

7 92. Reflex Media also seeks attorneys' fees, as allowed by § 502(e)(2) and an
8 award of punitive or exemplary damages as permitted by § 502(e)(4).

9 **THIRD CAUSE OF ACTION**
10 **Intentional Interference with Prospective Economic Advantage**
Against All Defendants

11 93. Reflex Media incorporates by reference each and every allegation contained
12 in the preceding paragraphs of this complaint as if fully set forth herein.

13 94. At all times relevant to this action, Reflex Media had a prospective contractual
14 relationship with the customers of its website, SeekingArrangement.com, and a reasonable
15 probability in the continuation of those business relationships.

16 95. Defendants had knowledge of these relationships because they—or their
17 agents and/or co-conspirators—subscribed as members of SeekingArrangement.com for the
18 purpose of mining SA Members' personal identifying information. Additionally, based on
19 information and belief, Defendants, including the Removal Website Defendants, knew or
20 should have known of these relationships. Indeed, a representative for a removal service
21 provider, Minc LLC, wrote to one SA member:

22
23 “Most of the clients I talk to that [are] posted on this site [are] also using some
24 sort of online dating service. We have seen a lot of clients tell me they signed
25 up for seeking arrangements. We don't know what the connection is between
26 online dating and this site but this is something I have seen and heard over the
past 4 months.”

27 96. Defendants intentionally, or with substantial certainty, interfered with the
28 relationship between Reflex Media and the SA Members by engaging in wrongful conduct,

specifically, the extortion scheme as described herein, including stealing and posting SA Member information to the Extortion Websites and sending text messages to alert SA Members that they could be removed by paying a fee, causing many SA Members to end their relationship with Reflex Media and subscription to SeekingArrangement.com. Additionally, Reflex Media, in some cases, had to offer free membership months to clients after they complained about Defendants' acts.

97. Even though SeekingArrangement.com is not in existence for prostitution (or child predation), based on the targeted actions of Defendants against SA Members and the stated goals of the Extortion Websites (below), it is obvious that Defendants intended to interfere with the economic relationship between Reflex Media and SA Members. The Extortion Websites state on their "FAQ" webpages the following:

"Why are you doing this?

Since the internet is a platform that makes it easy for men and women to promote and feed the sex industry. We are here to do our part in slowing it down. On a daily basis, we get emails from men and women who thanked us from saving them [] from being victimized. The countless numbers of wives who thank us for helping them find out the truth about their spouses. The thanks we get everyday are endless... Its sad but our community is happy to help. []you shouldnt be online offering men and women money for sex."

98. Defendants' above-described conduct has caused actual disruption to the relationship between Reflex Media and its customers.

99. As a result, Reflex Media has been damaged in an amount to be proven at trial.

100. As described herein, the Removal Sites were aware that the Extortion Websites planned to extort individuals on www.PredatorsAlerts.com, www.PredatorAlerts.com, www.PredatorAlerts.co, and www.PredatorExposed.com to obtain profits from the Removal Sites. Each Defendant intended for this extortion to be committed and/or cooperated in the execution of this plan. Interference in the economic relationship between Reflex Media and SA Members was a part of this plan. Therefore, each and every one of the Defendants is involved in a civil conspiracy and is liable for

1 these acts.

2 **FOURTH CAUSE OF ACTION**
3 **Negligent Interference with Prospective Economic Advantage**
4 *Against All Defendants*

5 101. Reflex Media incorporates by reference each and every allegation contained
6 in the preceding paragraphs of this complaint as if fully set forth herein.

7 102. At all times relevant to this action, Reflex Media had a prospective contractual
8 relationship with the customers of its website that probably would have resulted in a future
9 economic benefit to Reflex Media.

10 103. Based on information and belief, Defendants, including the Removal Website
11 Defendants, knew or should have known, of these relationships. Indeed, a representative
12 for a removal service provider, Minc LLC, wrote to one SA member:

13 Most of the clients I talk to that [are] posted on this site [are] also using some
14 sort of online dating service. We have seen a lot of clients tell me they signed
15 up for seeking arrangements. We don't know what the connection is between
16 online dating and this site but this is something I have seen and heard over the
17 past 4 months.

18 104. Defendants knew or should have known that this relationship would be
19 disrupted if they failed to act with reasonable care.

20 105. Accordingly, Defendants failed to act with reasonable care.

21 106. Defendants engaged in wrongful conduct by participating in the Extortion
22 Scheme described in this complaint, thereby causing many SA Members to end their
23 relationship with Reflex Media and subscription to SeekingArrangement.com.
24 Additionally, Reflex Media, in many cases, had to offer free membership months to clients
25 after they complained about Defendants acts.

26 107. Defendants' above-described conduct has caused actual disruption to the
27 relationship between Reflex Media and its customers.

28 108. As a result, Reflex Media has been damaged in an amount to be proven at
trial.

1 109. Defendants' wrongful conduct, participating in the Extortion Scheme as
2 described herein, was a substantial factor in causing Reflex Media's harm.

3 110. As described herein, the Removal Sites were aware that the Extortion
4 Websites planned to extort individuals on www.PredatorsAlerts.com,
5 www.PredatorAlerts.com, www.PredatorAlerts.co, and www.PredatorExposed.com to
6 obtain profits from the Removal Services. Each Defendant intended for this extortion to be
7 committed and/or cooperated in the execution of this plan. Therefore, each and every one
8 of the Defendants is involved in a civil conspiracy and is liable for these acts.

9 **FIFTH CAUSE OF ACTION**
10 **Common Law Unfair Competition**
Against All Defendants

11 111. Reflex Media incorporates by reference each and every allegation contained
12 in the preceding paragraphs of this complaint as if fully set forth herein.

13 112. The aforementioned acts of Defendants, including intentionally and/or
14 negligently interfering with Reflex Media's prospective economic advantage with its SA
15 Members, constitutes unfair competition in violation of the common law of the State of
16 California.

17 113. Based on information and belief, Defendants committed the acts alleged
18 herein oppressively, fraudulently, maliciously and in conscious disregard of Reflex
19 Media's rights within the meaning of Cal. Civ. Code § 3294. Reflex Media is therefore
20 entitled to exemplary and punitive damages pursuant to the California common law in an
21 amount sufficient to punish, deter, and make an example of Defendants.

22 114. Reflex Media has no adequate remedy at law and is suffering irreparable harm
23 and damage as a result of the aforesaid acts of Defendants in an amount not yet determined.

24 115. Based on information and belief, Defendants intend to continue their acts
25 unless restrained by this Court.

26 116. Upon information and belief, Defendants have obtained gains, profits and
27 advantages as a result of their wrongful acts in an amount to be proven at trial.

28 117. As described herein, the Removal Sites were aware that the Extortion

1 Websites planned to extort individuals on www.PredatorsAlerts.com,
 2 www.PredatorAlerts.com, www.PredatorAlerts.co, and www.PredatorExposed.com to
 3 obtain profits from the Removal Services. Each Defendant intended for this extortion to be
 4 committed and/or cooperated in the execution of this plan. Unlawful, unfair or fraudulent
 5 business acts or practices were a part of this plan. Therefore, each and every one of the
 6 Defendants is involved in a civil conspiracy and is liable for these acts.

7 **SIXTH CAUSE OF ACTION**
 8 **Unfair Competition (Cal. Bus. & Prof. Code § 17200 *et seq.*)**
 9 *Against All Defendants*

10 118. Reflex Media incorporates by reference each and every allegation contained
 11 in the preceding paragraphs of this complaint as if fully set forth herein.

12 119. As described above, Reflex Media has lost customers as a result of the
 13 Defendants' conduct described herein.

14 120. Defendants' unauthorized access to SeekingArrangement.com, use of SA
 15 Members' personal identifying information and then extortion of a fee to remove such
 16 information from the Extortion Websites is illegal and qualifies as "any unlawful, unfair or
 17 fraudulent business act or practice."

18 121. Reflex Media hereby requests that the Court enjoin Defendants from further
 19 engaging in such conduct and asks that Defendants be ordered to account for and
 20 permanently destroy any SA Member's personally identifying information mined from
 21 SeekingArrangement.com and any other website owned by Reflex Media.

22 122. As described herein, the Removal Sites were aware that the Extortion
 23 Websites planned to extort individuals on www.PredatorsAlerts.com,
 24 www.PredatorAlerts.com, www.PredatorAlerts.co, and www.PredatorExposed.com to
 25 obtain profits from the Removal Services. Each Defendant intended for this extortion to be
 26 committed and/or cooperated in the execution of this plan. Unlawful, unfair or fraudulent
 27 business acts or practices were a part of this plan. Therefore, each and every one of the
 28 Defendants is involved in a civil conspiracy and is liable for these acts.

////

PRAYER FOR RELIEF

WHEREFORE, Reflex Media prays for judgment against Defendants as follows:

1. Enter judgment against Defendants, jointly and severally, in favor of Reflex Media for each of the aforementioned causes of action;

2. Adjudge that Defendants and each of their agents (and subagents) and any other persons or entities working in concert or in participation with them be enjoined during the pendency of this action and thereafter permanently from:

a. Extorting Reflex Media's customers;

b. Using any image, word, phone number or other identifying information collected from Reflex Media's websites for any purpose;

c. Accessing any of Reflex Media's websites;

d. Otherwise competing unfairly with Reflex Media in any manner; and

e. Continuing to perform in any manner whatsoever any of the other acts complained of in this complaint.

3. Adjudge that Defendants, within fourteen (14) days after service of the judgement requested herein, be required to file with this Court and serve upon Reflex Media's counsel a written report under oath setting forth in detail the manner in which it has complied with the judgment;

4. Adjudge that Reflex Media recover from Defendant their actual damages and/or damages allowed by statute in an amount to be determined at trial;

5. Adjudge that Defendants be required to account for any profits that are attributable to their acts complained of herein;

6. Adjudge that Reflex Media recover punitive and/or treble damages from Defendants;

7. Adjudge that Reflex Media be awarded its costs incurred in connection with this action, including its reasonable attorneys' fees and investigative expenses;

8. Impose a constructive trust on all of Defendants' funds and assets that arise out of the acts complained of herein; and

1 9. Adjudge that Reflex Media recover all such other relief as the Court deems
2 just and proper.

3 **DEMAND FOR JURY TRIAL**

4 Reflex Media hereby demands a trial by jury.

5
6 DATED: February 26, 2018

SMITH WASHBURN, LLP

7 /s/ Mark L. Smith
8 _____
Mark L. Smith
9 Attorneys for Reflex Media, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2019, I caused true and correct copies of the forgoing **SECOND AMENDED COMPLAINT** to be served via CM/ECF or email to the following:

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